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January 26, 2007

*Via e-mail (muratore.kim@epa.gov) and U.S. Mail*

Kim Muratore (SFD-7-5)  
 U.S. EPA, Region 9  
 75 Hawthorne Street  
 San Francisco, CA 94105

**Re: Request for Information - San Fernando Valley/North Hollywood  
 Superfund Site, North Hollywood, CA**

Dear Ms. Muratore:

Provided herewith on behalf of California Car Hikers Service, a California corporation ("CCHS" or the "Company" herein), are responses to those questions posed in that certain letter dated November 22, 2006 from Frederick Schauffler, Chief, Site Cleanup Section 14, Superfund Division.

**I. Further Responses to Previous Question No.'s 14, 15, 16, 17 and 19:**

14. Responding to the inquiry concerning the "8501 Tujunga Avenue" address, to the best of the Company's knowledge, while Tujunga Avenue itself exists, that address ceased to exist prior to the Company's acquisition of the subject property. The entirety of the approximate 26.82 acres acquired by the Company is now, and to the best of the Company's knowledge has since its acquisition been encompassed by the addresses commonly known as 8520 Telfair Avenue, Sun Valley 91352 (APN 2632-011-010), 11590 Tuxford Street, Sun Valley 91352 (APN 2632-011-011) and 11409 Penrose Street, Sun Valley 91352 [erroneously referred to as 11490 Penrose Street in the above-referenced November 22, 2006 letter] (APN 2632-011-012).

Responding to the inquiry concerning the existence of a written lease between the Company and Aadlen Bros. Auto Wrecking, none exist. As for a written assignment or transfer of the lease as between Sam and Dorothy Adlen and former property owner Los Angeles By-Products Co., the Company is unable to locate a copy of any such document and on that basis does not know if there was a written assignment or transfer.

Responding to the inquiry concerning the existence of a written lease between the Company and other the various other entities identified as lessees and operating at 11409 Penrose Street in the Company's prior responses, there are no written lease agreements.

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Responding to the inquiry concerning the existence of a written lease between the Company on the one hand and Aadlen Bros. Auto Wrecking, A Foreign Auto Wrecking aka A- Foreign Auto Wrecking, and various other entities identified as lessees and operating at 8520 Telfair Avenue, there are no written lease agreements.

15. Not applicable. See further response to Question No. 14, above.

16. Not applicable. See further response to Question No. 14, above.

17. Not applicable. See further response to Question No. 14, above.

19. Not applicable. See further response to Question No. 14, above.

**II. Responses to New Question No.'s 1 - 5:**

1. The question is unclear as to the intended scope and meaning of the term "degreaser" which is also not defined in the March 28, 2006 Request for Information." Without waiving its objections to and the ambiguity of the question on that basis, and in the spirit of cooperation, to the best of the Company's knowledge and subject to further investigation, the "clarifier" is either a 3-stage or 4-stage type. However, the Company lacks knowledge that the clarifier was ever in fact used and on that basis also has no knowledge that there was any so-called end-products/wastes.

2. Based on information provided by the Los Angeles Metropolitan Transportation Authority, f/k/a Southern California Rapid Transit District ("RTD"), at each RTD bus maintenance yard, buses are fueled, cleaned, repaired, maintained and parked. The maintenance work is performed by skilled mechanics who repair or remove and replace dysfunctional components of major coach systems, including engine, electrical, suspension, fueling, pneumatic and hydraulic systems. In addition to cleaning the interior and exterior of buses, service attendants sweep, mop, and clean maintenance shops, restrooms, offices, work pits, and yard areas. Solvents, but not chromium, are used at RTD's bus maintenance facilities.

3. Yes, it would be the same clarifier.

4. To the best of the Company's knowledge, in or about 1970-1971 the 11409 Penrose parcel, comprising approximately 13 acres, was paved with asphalt. Then, commencing in or about 1971 and extending over an approximate 10-year plus period, the balance of the subject property was paved with cement. Ultimately the entire 26 acres has been paved with cement. Precise dates are presently unknown.

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5. Dirt/absorbents containing oil and oily rags. The dirt/absorbent is laid on the ground after a material drips. Note: no material is released into the environment because the area where absorbent is used is paved.

6. The question is unclear as to the intended scope and meaning of the term "degreasing" which is also not defined in the March 28, 2006 Request for Information." Without waiving its objections to and the ambiguity of the question on that basis, and in the spirit of cooperation, except as otherwise indicated in response to question Number 5, above, in connection with the operations of Los Angeles County Metropolitan Transportation Authority f/k/a Southern California Rapid Transit District, no parts-washing or degreasing was conducted on the subject property by the so-called auto-related businesses currently or previously operating at the property, and as such no solvents were used in connection with same.

7.
  - I. Batteries
    - A. Approx. every 3 days
    - B. No
    - C. N/A - not hazardous form of waste
  - II. Brake Fluid
    - A. Once per year
    - B. Yes
    - C. N/A - not hazardous form of waste
  - III. Engine Coolant (Antifreeze)
    - A. Every 6 months
    - B. Yes
    - C. N/A - not hazardous form of waste
  - IV. Mercury Switches
    - A. Once per year
    - B. No
    - C. N/A - not hazardous form of waste
  - V. Refrigerant (R-12 and R-134a)
    - A. Quarterly
    - B. No
    - C. N/A - not hazardous form of waste
  - VI. Scrap Metal
    - A. Daily

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- B. No
- C. N/A - not hazardous form of waste

VII. Used Oil

- A. Monthly
- B. Yes
- C. N/A - not hazardous form of waste

VIII. Waste Gasoline

- A. Monthly
- B. No
- C. N/A - not hazardous form of waste

IX. Oily Waste

- A. 365 Days
- B. Yes
- C. Yearly; copy of sampling report attached as Exhibit "1"

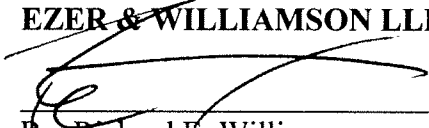
X. Rubbish

- A. 15 Days
- B. No
- C. N/A - not hazardous form of waste

8. See oversized map/plot plan attached as Exhibit "1" to our earlier letter dated June 19, 2006. The berm would be on all four sides of the areas marked 10 and 12. There have been no such spills of liquid run-off and as such there has no need to dispose of same.

Very truly yours,

**EZER & WILLIAMSON LLP**



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By: Richard E. Williamson

REW:mld

Enclosures

cc: California Car Hikers Service, Attn: Nathan B. Adlen, President

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781 East Washington Blvd., Los Angeles, CA 90021  
(213) 745-5312 FAX (213) 745-6372

## CERTIFICATE OF ANALYSIS

A. L. Vice

10/08/04

File# 74115

18639 Gallardo

Covina,

CA 91722

Aadlen Bros.

Andrew/Milt/Nathan

Attn: A. L. Vice

Phone: (213) 216-4939 Fax:

Sample#: 20042390-001

Collector: Client

Method: Picked Up By PLS

Received: 10/01/2004

Sampling Date/Time: 09/30/2004 3:00:00 PM

Type: Soil

I.D.: #1 Soil

Parameter	Prep/Test Method	Result	Unit	PQL
	Prep Date: 10/07/2004 Analysis Date: 10/07/2004			
Benzene	EPA 5030B EPA 8021B	10000	ug/kg	680
Toluene	EPA 5030B EPA 8021B	120000	ug/kg	680
Ethyl benzene	EPA 5030B EPA 8021B	40000	ug/kg	680
Xylene (Total)	EPA 5030B EPA 8021B	250000	ug/kg	1400
Surrogates	EPA 5030B EPA 8021B	"		
Trifluorotoluene	EPA 5030B EPA 8021B	52	Percent	
	Prep Date: 10/07/2004 Analysis Date: 10/07/2004			
TRPH	EPA 418.1	160000	mg/kg	3200

ND = Not Detected

NA = Not Applicable

PQL = Practical Quantitation Limit

Environmental Laboratory Accreditation Program Certificate No. 1131, LACSD No. 10138

Any remaining sample(s) for testing will be disposed of 30 days from receipt date unless notified

Authorized Signature(s)

20042390-001